

1 Paul T. Trimmer, Bar No. 9291  
2 [trimmerp@jacksonlewis.com](mailto:trimmerp@jacksonlewis.com)  
3 **JACKSON LEWIS P.C.**  
4 3800 Howard Hughes Parkway, Suite 600  
5 Las Vegas, Nevada 89169  
6 Tel: (702) 921-2460  
7 Fax: (702) 921-2461  
8 *Attorneys for Defendant*  
9 *Victoria Partners d/b/a*  
10 *Monte Carlo Resort and Casino*

11 **UNITED STATES DISTRICT COURT**  
12  
13 **DISTRICT OF NEVADA**

14 LISA NEGRELLI, an individual,

15 Case No. 2:15-cv-01840-GMN-NJK

16 Plaintiff,

17 v.

18 MGM RESORTS INTERNATIONAL, d/b/a  
19 MONTE CARLO RESORT AND CASINO;  
20 and CULINARY WORKERS UNION  
21 LOCAL 226; and DOES 1-50, inclusive,

22 Defendants.

23 **STIPULATION TO: (1) DISMISS  
24 DEFENDANT MGM RESORTS  
25 INTERNATIONAL WITH PREJUDICE; (2)  
26 CORRECT CAPTION AND NAME  
27 VICTORIA PARTNERS d/b/a MONTE  
28 CARLO RESORT AND CASINO AS  
DEFENDANT; AND, (3) EXTEND TIME  
FOR DEFENDANTS TO RESPOND TO  
PLAINTIFF'S FIRST AMENDED  
COMPLAINT**

29 **[First Request]**

30 COMES NOW Defendants Victoria Partners d/b/a Monte Carlo Resort and Casino,  
31 improperly named as "MGM Resorts International, d/b/a Monte Carlo Resort and Casino"  
32 (hereinafter referred to as "Defendant"), Culinary Workers Union Local 226, and Plaintiff Lisa  
33 Negrelli (hereinafter referred to as "Plaintiff"), by and through their respective attorneys, as  
34 follows:

35 IT IS STIPULATED that the Defendant named as "MGM Resorts International d/b/a  
36 Monte Carlo Resort and Casino" shall be dismissed with prejudice from this action and shall be  
37 stricken from the caption.

38 IT IS FURTHER STIPULATED that Defendant "Victoria Partners d/b/a Monte Carlo  
39 Resort and Casino" shall be substituted as the Defendant and that the caption shall be revised to  
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1 reflect that "Victoria Partners d/b/a Monte Carlo Resort and Casino" is named employer  
2 Defendant in the case.

3 IT IS FURTHER STIPULATED that Defendants Victoria Partners d/b/a Monte Carlo  
4 Resort and Casino and Culinary Workers Union Local 226 shall have seven (7) days from the  
5 date the Court enters this order to answer or otherwise respond to Plaintiff's Complaint.  
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7 This stipulation is submitted and based upon the following:

8 1. No Defendants have answered or otherwise responded to Plaintiff's Complaint and  
9 there is good cause for dismissing MGM Resorts International from this action;  
10 2. There is good cause for correcting the caption and substituting Victoria Partners d/b/a  
11 Monte Carlo Resort and Casino as the Defendant in this action;  
12 3. That this is the first request to extend time for Defendant to answer or otherwise  
13 respond to Plaintiff's Complaint and there is good cause for the request; and,  
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1           4. That this request is made in good faith and not for the purpose of delay.

2           Dated: October 29, 2015

Dated: October 29, 2015

3           JACKSON LEWIS P.C.

SANTACROCE LAW OFFICES, LTD.

4           /s/ Paul T. Trimmer

/s/ Frederick A. Santacroce

5           Paul T. Trimmer  
6           3800 Howard Hughes Parkway  
7           Ste. 600  
8           Las Vegas, NV 89169  
9           *Attorneys for Defendant Victoria Partners*

Frederick A. Santacroce  
3275 S. Jones Blvd.  
Suite 104  
Las Vegas, NV 89146  
*Attorneys for Plaintiff*

10           McCracken Stemerman & Holsberry

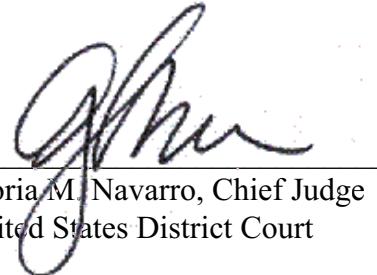
11           /s/ Kristin L. Martin

12           Kristin L. Martin  
13           1630 S. Commerce St., Suite A-1  
14           Las Vegas, NV 89102  
*Attorneys for Defendant Culinary Workers*

15           Union Local 226

16           **IT IS SO ORDERED.** “MGM Resorts International d/b/a Monte Carlo Resort and Casino” shall be dismissed with prejudice. The Clerk shall revise the caption in this action by deleting “MGM Resorts International, d/b/a Monte Carlo Resort and Casino” and replacing it with “Victoria Partners d/b/a Monte Carlo Resort and Casino.”

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Gloria M. Navarro, Chief Judge  
United States District Court

DATED: October 30, 2015